

FILED

JUN -8 2022

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)

v.)

No. S1-4:22 CR 229 JAR JMB

DAVANTE LINDSEY, a/k/a "Jizzlebuckz,")
ANDRE PEARSON, a/k/a "Luh Half,")
TONY EVANS, a/k/a "Big Boy,")
ARAVEN JOHNSON,)
DOUGLAS SIMPSON,)
JEFFREY MOORE,)
SHAWN LIGGINS,)
OMAR LEWIS, a/k/a "Mo,")
WILLIE LINDSEY,)
JAMOND DISMUKES, a/k/a "Huncho,")
EDWARD HOPKINS, a/ka/ "Edot,")
TRAVON WEATHERSPOON,)
BIRTHA LINDSEY,)
ERIK SIMMONS,)
Defendants.)

SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges that:

Beginning at an unknown date and continuing for a period of time, including September 30, 2021 and continuing up to the date of this Indictment, with exact dates unknown, within the Eastern District of Missouri and elsewhere,

**DAVANTE LINDSEY, a/k/a "JIZZLEBUCKZ," ANDRE PEARSON, a/k/a "LUH HALF,"
TONY EVANS, a/k/a "BIG BOY," OMAR LEWIS, a/k/a "MO," ARAVEN JOHNSON,
DOUGLAS SIMPSON, JEFFREY MOORE, SHAWN LIGGINS, BIRTHA LINDSEY,
TRAVON WEATHERSPOON, JAMOND DISMUKES, and ERIK SIMMONS**

the Defendants herein, and others known and unknown, did knowingly and intentionally conspire, confederate, combine, and agree to distribute and to possess, with the intent to distribute, over 40 grams

of a mixture or substance containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections 846 and 841(a) and punishable under Title 21, United States Code, Section 841(b)(1)(B)(vi).

COUNT TWO

The Grand Jury further charges that:

On or about January 10, 2022, in the City of St. Louis, within the Eastern District of Missouri,

DOUGLAS SIMPSON AND JEFFREY MOORE,

the Defendants herein, did knowingly and intentionally possess, with the intent to distribute, a mixture or substance containing forty (40) grams or more of a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B)(vi).

COUNT THREE

The Grand Jury further charges that:

On or about January 18, 2022, in the City of St. Louis, within the Eastern District of Missouri,

SHAWN LIGGINS,

the Defendant herein, did knowingly and intentionally possess, with the intent to distribute, a mixture or substance containing forty (40) grams or more of a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B)(vi).

COUNT FOUR

The Grand Jury further charges that:

On or about January 18, 2022, in the City of St. Louis, within the Eastern District of Missouri,

SHAWN LIGGINS,

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to possess with the intent to distribute fentanyl as set forth in Count Four.

In violation of Title 18, United States Code, 924(c)(1).

COUNT FIVE

The Grand Jury further charges that:

On or about February 17, 2022, in the City of St. Louis, within the Eastern District of Missouri,

DAVANTE LINDSEY, a/k/a "JIZZLEBUCKZ",

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to conspiracy to distribute fentanyl as set forth in Count One.

In violation of Title 18, United States Code, 924(c)(1).

COUNT SIX

The Grand Jury further charges that:

On or about February 28, 2022, in the City of St. Louis, within the Eastern District of Missouri:

TONY EVANS, a/k/a "BIG BOY" AND OMAR LEWIS, a/k/a/ "MO",

the Defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

The Grand Jury further charges that:

On or about March 14, 2022, in the City of St. Louis, within the Eastern District of Missouri,

ANDRE PEARSON, a/k/a "LUH HALF" AND ARAVEN JOHNSON,

the Defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHT

The Grand Jury further charges that:

On or about April 5, 2022, in the City of St. Louis, within the Eastern District of Missouri,
ANDRE PEARSON, a/k/a "LUH HALF" AND OMAR LEWIS, a/k/a "MO",
the Defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT NINE

The Grand Jury further charges that:

On or about April 5, 2022, in the City of St. Louis, within the Eastern District of Missouri,
OMAR LEWIS, a/k/a "MO",
the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to distribute fentanyl as set forth in Count Eight.

In violation of Title 18, United States Code, 924(c)(1).

COUNT TEN

The Grand Jury further charges that:

On or about April 8, 2022, in the City of St. Louis, within the Eastern District of Missouri,
ANDRE PEARSON, a/k/a "LUH HALF" AND OMAR LEWIS, a/k/a "MO",
the Defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ELEVEN

The Grand Jury further charges that:

On or about April 19, 2022, in the City of St. Louis, within the Eastern District of Missouri,

ANDRE PEARSON, a/k/a "LUH HALF" AND OMAR LEWIS, a/k/a "MO",

the Defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWELVE

The Grand Jury further charges that:

On or about April 19, 2022, in the City of St. Louis, within the Eastern District of Missouri,

OMAR LEWIS, a/k/a "MO",

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to distribute fentanyl as set forth in Count Eleven.

In violation of Title 18, United States Code, 924(c)(1)

COUNT THIRTEEN

The Grand Jury further charges that:

On or about April 19, 2022, in the City of St. Louis, within the Eastern District of Missouri,

DAVANTE LINDSEY, a/ka/ "JIZZLEBUCKZ" AND OMAR LEWIS, a/k/a "MO",

the Defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

The Grand Jury further charges that:

On or about April 28, 2022, in the City of St. Louis, within the Eastern District of Missouri,

DAVANTE LINDSEY, a/k/a "JIZZLEBUCKZ",

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to conspiracy to distribute fentanyl as set forth in Count One.

In violation of Title 18, United States Code, 924(c)(1).

COUNT FIFTEEN

The Grand Jury further charges that:

On or about April 28, 2022, in the City of St. Louis, within the Eastern District of Missouri,

ARAVEN JOHNSON,

the Defendant herein, did knowingly and intentionally possess, with the intent to distribute, a mixture or substance containing methamphetamine, a Schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a).

COUNT SIXTEEN

The Grand Jury further charges that:

On or about April 28, 2022, in the City of St. Louis, within the Eastern District of Missouri,

ARAVEN JOHNSON,

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to possession with intent to distribute methamphetamine as set forth in Count Thirteen.

In violation of Title 18, United States Code, 924(c)(1).

COUNT SEVENTEEN

The Grand Jury further charges that:

On or about April 28, 2022, in St. Louis County, within the Eastern District of Missouri,

ANDRE PEARSON, a/k/a "LUH HALF",

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, to conspiracy to distribute fentanyl as set forth in Count One.

In violation of Title 18, United States Code, 924(c)(1).

COUNT EIGHTEEN

The Grand Jury further charges that:

On or about April 28, 2022, within the Eastern District of Missouri,

**DAVANTE LINDSEY, a/k/a "JIZZLEBUCKZ," WILLIE LINDSEY, JAMOND DISMUKES,
a/ka/ "HUNCHO," AND EDWARD HOPKINS, a/k/a "EDOT",**

the Defendants herein, did knowingly conspire to use intimidation and threats against Araven Johnson, with the intent to hinder, delay, and prevent the communication of information to a law enforcement officer relating to the commission of a federal offense.

In violation of Title 18, United States Code, Section 1512(b)(3) and 1512(k).

COUNT NINETEEN

The Grand Jury further charges that:

On or about May 4, 2022, in St. Louis County, within the Eastern District of Missouri,

TRAVON WEATHERSPOON AND ERIK SIMMONS,

the Defendants herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY

The Grand Jury further charges that:

On or about May 25, 2022, in the City of St. Louis, within the Eastern District of Missouri,

JAMOND DISMUKES,

the Defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance drug.

In violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, as set forth in One, Two, Three, Six, Seven, Eight, Ten, Eleven, Thirteen, Fifteen, Nineteen, and Twenty, the defendants shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.
2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations set forth in Counts One, Two, Three, Six, Seven, Eight, Ten, Eleven, Thirteen, Fifteen, Nineteen, and Twenty.
3. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1512 as set forth in Count Eighteen, the defendants shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.
4. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to the violation set forth in Count Eighteen.
5. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 924(c) as set forth in Counts Four, Five, Nine, Twelve, Fourteen, Sixteen, and Seventeen, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said violations.

6. Specific property subject to forfeiture includes, but is not limited to, the following:
 - a. Ruger LC380 Pistol;
 - b. Glock GMBH 41GEN4 Pistol;
 - c. Ruger LC380 Pistol;
 - d. Glock GMBH 41GEN4 Pistol;
 - e. SCCY Industries, LLC (Skyy Ind.) CPX-2 Pistol;
 - f. CMMG Inc. MK57 Banshee Pistol;
 - g. Romarm/Cugir Micro Draco Pistol;
 - h. Ruger LC380 Pistol;
 - i. Smith & Wesson M&P 9 Shield Pistol;
 - j. Approximately \$7,120.00 U.S. Currency;
 - k. Approximately \$77,408.00 U.S. Currency; and
 - l. 2015 Dodge Challenger Passenger, VIN: 2C3CDZC94FH892732;
 - m. 2018 Jeep Grand Cherokee Passenger, VIN 1C4RJFN90JC365695.
7. If any of the property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

JENNIFER L. SZCZUCINSKI, #56906MO
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